

## Indiana Department of Environmental Management

We make Indiana a cleaner, healthier place to live.

Frank O'Bannon Governor

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100 North Senate Avenue P.O. Box 6015 Indianapolis, Indiana 46206-6015 (317) 232-8603 (800) 451-6027 www.in.gov/idem

August 20, 2002

**Underground Storage Tank Owners and Operators Environmental Consultants and Interested Parties** 

Dear Sir/Madam:

Underground Storage Tank Branch Re: Guidance Manual Update

Attached is "The Underground Storage Tank Branch Guidance Manual" (Manual) dated October 1994 as well as the "Underground Storage Tank Notification, Reporting, and Closure Requirements" revised chapter dated May 2002. The manual is intended to assist underground Underground Storage Tank (UST) owners and operators and environmental consultants in meeting Leaking Underground Storage Tank (LUST) requirements.

Some of the supplemental information included in the original publication is no longer included because the information is either outdated or can be easily obtained from other sources. Information about how to obtain this new information is included with this update.

Although the Risk Integrated System of Closure (RISC) non-rule policy document will ultimately replace the LUST components of the 1994 UST Guidance, those components may still be a tool used.

If you have any questions or comments regarding these updates, please call 317/232-8900 or call toll free from within Indiana at 800/451-6027 (dial "0" and request extension 2-8900).

Sincerely,

Craig Schroer, Section Chief Leaking Underground Storage Tank Section Office of Land Quality

**Enclosures** 



# **UST Branch Guidance Manual Updates and Information Summary**

## **Telephone Numbers**

- **UST Section -** 317/308-3064
- **LUST Section -** 317/232-8900
- **ELTF Section -** 317/234-0990
- **Brownfields -** 317/233-2570
- ➤ **IDEM Hotline -** 800/451-6027 (If you are calling from within Indiana, you can call toll-free and request the telephone numbers listed above.)
- Emergency Response Section 317/233-7745 (If you are calling from within Indiana, you can call toll-free at 888/233-7745.)

#### **Location and Mailing Address**

- ➤ UST Section 67-01-2, 2525 N. Shadeland Avenue, Indianapolis, Indiana 46219
- LUST Section 67-18, 100 N. Senate Avenue, Indiana Government Center North, Room 1101, P.O. Box 6015, Indianapolis, Indiana 46206-6015 (Discontinue use of P.O. Box 7015.)
- **ELTF Section -** 67-02, 100 N. Senate Avenue, Indiana Government Center North, Room 1101, P.O. Box 6015, Indianapolis, Indiana 46206-6015
- File Room 100 N. Senate Avenue, Indiana Government Center North, Room 1255, 100 North Senate Avenue, Indianapolis, Indiana 46206-6015

### **Business Hours**

- ➤ UST, LUST and ELTF 8:15 AM to 4:45 PM, Monday through Friday except for holidays
- File Room 8:30 AM to 4:30 PM, Monday through Friday except for holidays

#### **Web Sites**

- > UST http://www.IN.gov/idem/land/ust/index.html
- **LUST** http://www.IN.gov/idem/land/lust/index.html
- LUST Site Information http://www.IN.gov/idem/land/lust/datacover.html
- **ELTF** http://www.IN.gov/idem/land/eltf/index.html
- > **RISC** http://www.IN.gov/idem/land/risc/index.html
- **Brownfields** http://www.IN.gov/idem/land/brownfields/index.html

Risk Integrated System of Closure – On February 15, 2001, the Risk Integrated System of Closure (RISC) Non-rule Policy Document (NPD) was finalized and published in two volumes including the Technical Guide and User's Guide. A printed copy can be obtained by calling 317/232-8997 or from the RISC web site shown above. All LUST releases reported on or after February 16, 2002, must use the RISC NPD for site characterization and closure. All releases reported on or before that date, may choose either option for closure if an Initial Site Characterization (ISC) Report was submitted within 45 days of the release report or time extension date granted by IDEM staff. If a release was reported before the end of the transition period, but no ISC was ever submitted, you may be required to use RISC. The scope of this guidance is not intended to address sites using RISC.

<u>UST Closure</u> – UST closure may require ground water screening. You should consult the UST Section or refer to the UST Rule (329 IAC 9-6) regarding this requirement before initiating a UST Closure.

<u>LUST Release Reporting</u> – All sites that have a suspected or confirmed release must report within 24 hours. This includes any field monitoring results or laboratory test results that exceed detection limit as defined in the UST Rule (329 IAC 9) and Guidance Manual.

- Call 317/232-8900, Monday through Friday between 8:15 AM and 4:45 PM, EST
- Fax a report using the "LUST Initial Incident Report" form found on the LUST web page
- ➤ Email a LUST report using the "LUST Initial Incident Report" to LeakingUST@dem.state.in.us
- Call 317/233-7745 or 888/233-7745 within Indiana after hours and on weekends and holidays

<u>Laboratory Testing Methods</u> – Since the Manual was initially drafted, laboratory testing methods have been updated or replaced. Alternative methods are acceptable for UST Closure site assessment, LUST site characterization, and LUST closure sampling. The most current methods should be used. The appropriate method may depend on the contaminant source and project objectives. In some cases, alternative methods are available as well. In most cases, the methods are found in the most current version of the "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," U.S. Environmental Protection Agency (EPA) Publication SW-846. For additional information regarding approved methods, please call 317/232-3215.

- ➤ Waste Oil and related petroleum products The UST Rule and Guidance currently requires the use of SW-846 Method 418.1 IR. Alternative methods include U.S. EPA Method 1664, SW-846 Method GC/FID 8015C with quantitation up to C<sub>35</sub>, and SW-846 Method 9071B with soxhlet extraction.
- ➤ Volatile Organic Compounds The 1994 UST Guidance requires the use of SW-846 Method GC/MS 8240/60 or Method GC/PID 8020 when analyzing for volatile organic compounds (VOCs) including benzene, toluene, ethyl benzene, and xylene (BTEX) and methyl tertiary butyl ether (MTBE). The current methods are SW-846 GC/MS 8260B and SW-846 Method GC/PID 8021B.
- ➤ Semivolatile Organic Compounds The 1994 UST Guidance requires the use of SW-846 Method GC/MS 8270 or Method GC/MS 525 when analyzing for semivolatile organic compounds (SVOCs). The current method is SW-846 GC/MS 8270C. An alternative method may be SW-846 8310 depending on the project objectives. The IDEM Project Manager should be contacted for guidance regarding the appropriate laboratory methodology.

<u>Direct Push Technology</u> – Use of direct push technology, such as Geoprobe, is appropriate for ground water screening and ground water delineation. However, it is generally not acceptable for use as a monitoring well when conducting time series monitoring. The only exceptions are as follows:

- ➤ The Geoprobe removes at least a 4" core for monitoring well installation
- ➤ The IDEM Project Manager approves the use of a Geoprobe well installed in another manner based on site-specific issues.

<u>New Technology Evaluation</u> – For review and evaluation of new technologies associated with site characterization and remediation of LUST sites, please contact Steve Poe, Geological Services, at 317/234-0992 or by e-mail at <a href="mailto:spoe@dem.state.in.us">spoe@dem.state.in.us</a>.

<u>Selection of Environmental Consultants</u> – IDEM does not certify or approve environmental consultants. It is the UST owner's and operator's responsibility to select the consultant. You can find a list of environmental consultants in the Yellow Pages of you local telephone book. You may also search Yellow Pages on the internet at many locations. One web site is <a href="http://www.yellowpages.net">http://www.yellowpages.net</a>. Enter "environmental" under the business type and select a city and state.

Under most circumstances, IDEM recommends that you obtain proposals from at least three consultants. Before signing a contract, make sure the consultant can perform the following in accordance with LUST guidance and laws:

- ➤ Provide equipment and services necessary to conduct site characterization or corrective action activities directly or with subcontractors
- Conduct site characterization activities necessary to determine the extent of soil and ground water contamination
- Follow proper sampling collection, handling, and chain-of-custody procedures
- Ensure that proper laboratory methods are used and proper quality procedures are followed
- Obtain necessary manifests, approvals and permits for treatment, storage or disposal of contaminated material
- Prepare required reports and plans necessary to document site activities and proposed cleanups
- > Prepare and submit claims for reimbursement to the Excess Liability Trust Fund program.
- ➤ Provide references regarding prior experience performing related activities

<u>Electronic Submission of LUST Reports</u> – The following reports may be submitted electronically as Portable Document Format (pdf) documents:

- ➤ Abatement Report
- ➤ Free Product Removal Report
- ➤ Initial Site Characterization Report
- ➤ Further Site Investigation Report
- ➤ Corrective Action Plan and Amendments
- ➤ Corrective Action Progress Report

Submission of one paper copy is required for all reports. Submit electronic data and paper copies as directed by the LUST Project Manager. Sampling and monitoring data may also be submitted as a tab-delimited text file. For additional information regarding electronic reporting formats, see the Office of Land Quality's (OLQ's) Electronic Data Submittal web page: http://www.in.gov/idem/land/datasubmittal/digdatasubmittal.html

Electronic Submission of LUST Site Locational Data – The LUST program requests the collection of one or more electronic site locations as part of site characterization activities. The location information should include the source, precision, and date of collection. Locational data (locational coordinates or maps) for LUST sites and sampling locations may be submitted electronically as a tab-delimited text file. Locational coordinates and map data must be submitted in one of the following formats:

- Geographics (latitude/longitude),
- > Indiana State Plane, or
- ➤ Universal Transverse Mercator (UTM) coordinate systems.

The datum, measurement units, coordinate system and the EPA Method Accuracy Description (MAD) code for each location or map must be specified in the submitted data file. For additional information regarding electronic reporting formats, see the OLQ's Electronic Data Submittal web page (<a href="http://www.IN.gov/idem/land/datasubmittal/digdatasubmittal.html">http://www.IN.gov/idem/land/datasubmittal/digdatasubmittal.html</a>).

<u>Corrective Action Progress Reports (CAPRs) and Quarterly Monitoring</u> – CAPRs must now be submitted based on a new schedule. This schedule change is intended to make it simpler for responsible parties and LUST staff. The following is the new schedule:

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Quarter 1: January 1 - March 31 - Report Due April 30
Quarter 2: April 1 - June 30 - Report Due July 31
Quarter 3: July 1 - September 30 - Report Due October 31
Quarter 4: October 1 - December 31 - Report Due January 31
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<u>Indiana Code (IC)</u> – The IC may be obtained from the internet: <a href="http://www.IN.gov/idem/land/rules/ic.html">http://www.IN.gov/idem/land/rules/ic.html</a> such as IC 13-23 – Underground Storage Tanks

<u>Indiana Administrative Code (IAC)</u> – The IAC may be obtained from the internet: <a href="http://www.in.gov/idem/land/rules/iac.html">http://www.in.gov/idem/land/rules/iac.html</a> or by calling the LUST program.

- ➤ 327 IAC 2-6.1 Spill Rule,
- > 328 IAC Underground Storage Tank Financial Assurance Board Eligibility Rules, and
- ➤ 329 IAC 9 Underground Storage Tanks.

Non-Rule Policy Documents and Other Guidance – Several relevant non-rule policy documents are available. To obtain copies of final or draft policies visit the LUST web site or call 317/232-8900.

- Properties Containing Contaminated Aquifers/Underground Storage Tanks
- Excess Liability Trust Fund
- ➤ Risk Integrated System of Closure
- ➤ Access to Third Party Property
- ➤ Draft Monitored Natural Attenuation for Petroleum Releases
- ➤ Draft Methyl-Tertiary Butyl Ether (MTBE) Remediation
- ➤ Drilling Procedures and Monitoring Well Construction Guidelines

Look for updates regarding revisions on the LUST web site.

<u>Memorandum</u> – Attached is a copy of the "Consent for Access under Authority of the Indiana Environmental Management Act" which may be used by responsible parties to facilitate access to third party property to address contamination that has crossed property boundaries.

<u>ELTF Information</u> – Information including the application can be obtained from the ELTF web site at http://www.IN.gov/idem/land/eltf/index.html or by calling 317/234-0990.

<u>Brownfields/UST Fields</u> – For information regarding these programs, you may visit the Brownfields web site at <a href="http://www.IN.gov/idem/land/brownfields">http://www.IN.gov/idem/land/brownfields</a> or by calling 317/233-2570

<u>Other Requirements</u> – Owners and operators must comply with all state and federal requirements when conducting site characterization and corrective action. For information regarding these requirements, you should contact the appropriate program area or contact David Parry at <a href="http://www.in.gov/idem/guides/permit">http://www.in.gov/idem/guides/permit</a> or call 317/233-4638.

- Land Development such as storm water runoff associated with construction activity Contact Craig Lawson at <a href="mailto:clawson@dem.state.in.us">clawson@dem.state.in.us</a> or call 317/233-1869.
- ➤ Air Issues such as volatile organic compound emissions during treatment Contact the "Permit Reviewer of the Day" at OAMPROD@dem.state.in.us or call 317/233-0178.
- ➤ Water Issues such as point source discharges of wastewater to waters of the state and construction of wastewater pretreatment or treatment facilities Contact Steve Roush at <a href="mailto:sroush@dem.state.in.us">sroush@dem.state.in.us</a> or call 317/232-8706
- ➤ Waste Handling and Disposal such as storage, treatment or disposal of petroleum contaminated soil or sludge Contact Tracy Barnes at <a href="mailto:tbarnes@dem.state.in.us">tbarnes@dem.state.in.us</a> or call 317/308-3110
- > Spills and overfills that exceed 25 gallons must be reported within 24 hours and any spills subject to reporting pursuant to the Spill Rule, 327 IAC 2-6.1 must be reported within 2 hours by calling 317/233-7745 or toll free at 888/233-7745 (from within Indiana).